



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 2, 2020

By CM/ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: *United States v. Knox,*
15 Cr. 445 (PAE)**

Dear Judge Engelmayer:

The Government respectfully writes in response to the Court's Order dated May 1, 2020 directing the parties to confer with each other and the Probation Department about whether it would be appropriate to allow defendant William Knox to leave the premises of his home confinement for employment purposes, as Knox requested in a voicemail to the Court. Pursuant to the Court's Order, the Government spoke with defense counsel on Friday, who supported Knox's request, and with Probation, which took no position on Knox's request. In the Government's conversation with Probation, Probation noted its concern that the extent to which new employment opportunities are available at present is unclear to Probation in light of COVID-19 restrictions.

The Government believes that the resolution that makes the most sense is for Knox to bring to the attention of his Probation Officer any specific job opportunity that he wishes to pursue and the manner in which his plan for doing so would require him to leave the premises of his home confinement, and for Probation to then determine on a case by case basis whether to authorize Knox's departure from the premises in connection with that potential employment opportunity. The Government believes that this would be consistent with the conditions in place under the Court's April 10, 2020 Order allowing Knox to leave the premises of his home detention "as otherwise authorized in advance by the Probation Department." The Government also believes that Knox's resultant consultations with Probation concerning his pursuit of employment may

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facilitate that pursuit in light of the experience that Probation brings to bear in the circumstances following incarceration.

Respectfully submitted,

GEOFFREY S. BERMAN
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By: /s/
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May 4, 2020

The Court agrees with the Government's proposed resolution and therefore authorizes Knox to bring to the attention of his Probation Officer any specific job opportunity that he wishes to pursue and the manner in which his plan for doing so would require him to leave the premises of his home confinement, and for Probation to then determine on a case-by-case basis whether to authorize Knox's departure from the premises in connection with that potential employment opportunity.

The Court further agrees that such a resolution would be consistent with the conditions in place under the Court's April 10, 2020 Order allowing Knox to leave the premises of his home detention "as otherwise authorized in advance by the Probation Department." Dkt. 1088 at 4. However, to the extent that the Probation Office or defense counsel believe an additional order is required to allow the above-described procedure for Knox to seek employment, counsel may email a proposed order to EngelmayerNYSDChambers@nysd.uscourts.gov for the Court's review.

The Court thanks all counsel and the Probation Office for their prompt and thoughtful attention to this matter.

SO ORDERED.


PAUL A. ENGELMAYER

United States District Judge